

1 HONORABLE TIFFANY M. CARTWRIGHT
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 RYAN RANER, an individual,

11 Plaintiff,

12 v.

13 THE FUN PIMPS ENTERTAINMENT,
14 LLC, a Texas limited liability company;
15 RICHARD HUENINK, JR., an individual;
16 and JOEL HUENINK, an individual,

17 Defendants.

18 THE FUN PIMPS ENTERTAINMENT,
19 LLC, a Texas limited liability company,

20 Counterclaim Plaintiff,

21 v.

22 RYAN RANER, an individual,

23 Counterclaim Defendant.

Case No. 3:22-cv-05718-TMC

STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
DISCOVERY DATES

NOTE ON MOTION CALENDAR: October
26, 2023

24 **STIPULATION**

25 The parties jointly stipulate and respectfully move the Court for an order extending all
26 discovery dates as set forth herein. The extension of the discovery dates as requested herein will
not impact the trial or related dates. The parties believe that good cause is shown for this extension
for at least the following reasons:

27 • The current initial expert disclosure deadline is November 13, 2023, and rebuttal

1 expert disclosures due on December 13, 2023.

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- 3 Plaintiff has requested, and Defendant has agreed, to extend the initial expert disclosure and rebuttal expert disclosure deadlines.
- 4 Along with the extended expert disclosure deadlines, both parties agree that additional time is needed to complete discovery in light of both witness and counsel professional and personal commitments, extending the close of discovery by one month, from January 22nd to February 23rd.
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- 8 The parties also request that the dispositive motion deadline be extended by two weeks, from February 21st to March 7th to allow the completion of discovery prior to the deadline for dispositive motions.
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- 11 The requested extensions do not impact the current trial setting or any trial-related deadlines.
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13 The proposed new schedule is as follows:

Action	Current Date	Proposed Date
5 DAY JURY TRIAL set for 09:00 AM	May 21, 2024	No change
Disclosure of expert testimony under FRCP 26(a)(2)	Nov 13, 2023	Dec 4, 2023
Disclosure of rebuttal expert testimony under FRCP 26(a)(2)	Dec 13, 2023	Jan 15, 2024
All motions related to discovery must be filed by	Dec 26, 2023	Jan 26, 2024
Discovery completed by	Jan 22, 2024	Feb 23, 2024
All dispositive motions must be filed by	Feb 21, 2024	Mar 7, 2024
Motions in limine should be filed pursuant to Local Rule CR 7(d)(4) by	Apr 15, 2024	No change
Agreed pretrial order filed with the Court by	Apr 29, 2024	No change
Trial briefs, proposed <i>voir dire</i> , jury instructions, agreed neutral statement of the case and deposition designations due by	Apr 30, 2024	No change
Pretrial conference will be held at 03:00 PM on	May 6, 2024	No change

24 The stipulated extension is not submitted for the purposes of delay, but rather due to
 25 litigation and party logistics, and is in the interest of justice and fairness. The parties respectfully
 26 request that the Court agree to the stipulated extension of time and issue the proposed order
 27 submitted herewith.

1 RESPECTFULLY SUBMITTED: October 27, 2023.

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10 **Attorneys for Ryan Raner**

11 I certify that this memorandum contains 388
12 words, in compliance with the Local Civil
13 Rules.

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26 **Attorneys for Defendant**

27 **ORDER**

18 Pursuant to the Stipulation of the parties, IT IS SO ORDERED.

19 DATED this 27th day of October, 2023.

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22 Tiffany M. Cartwright
23 United States District Court Judge